

Exhibit 14

1 IN RE NATIONAL PRESCRIPTION OPIATE LITIGATION

MDL No. 2804

2 Case No. 17-md-2804

3 THIS RELATES TO:

4
5 CITY OF CLEVELAND, OHIO, ETAL VS. PURDUE PHARMA L.P.

6 ET AL CASE NO. 18-OP-45132

7
8 THE COUNTY OF CUYAHOGA, OHIO, ET AL VS. PURDUE

9 PHARMA L.P., ET AL CASE NO. 18-OP-45090

10
11 THE COUNTY OF SUMMIT, OHIO, ET AL VS. PURDUE PHARMA

12 L.P., ET AL CASE NO. 17-OP-45004

13
14
15 VIDEO DEPOSITION OF

16
17 MAGGIE KEENAN

18
19
20 JANUARY 18, 2019

21
22 DEPOSITION HELD AT CLIMACO, WLICOX, PECA & GAROFOLI

23 55 PUBLIC SQUARE

24
25 CLEVELAND, OH 44113

APPEARANCES

Mr. J. Andrew Keyes, Mr. Paul Boehm & Ms. Melinda
Johnson

William & Connolly, LLP

725 12th Street, N.W.

Washington, D.C. 20005

(202) 434-5584

For Cardinal Health

Mr. Salvatore C. Badala

Napoli Shkolnik, PLLC

400 Broadhollow Road, Suite 305

Melville, NY 11747

(631) 224-1133

For Cuyahoga County

Mr. Frank L. Gallucci, III

Plevin Gallucci

55 Public Square, Suite 2222

Cleveland, OH 44113

(216) 863-0804

For Cuyahoga County

APPEARANCES CONTINUED

Ms. Maria Fleming

Napoli Shkolnik

600 Superior Avenue East, Suite 1300

Cleveland, OH 44114

(212) 397-1000

For Cuyahoga County

Ms. Sarah Conway

Jones Day

555 South Flower Street

Los Angeles, CA 90071

(213) 489-393

For Wal-mart

Mr. Justin E. Rice

Tucker Ellis

950 Main Avenue, Suite 1100

Cleveland, OH 44113

(216) 696-3670

For Janssen and Johnson and Johnson

APPEARANCES CONTINUED

Mr. David Haller
Covington & Burling
620 Eighth Avenue
New York, NY 10018
(212) 841-1000
For McKesson

Ms. Monique Hannam (By phone)
Barnes & Thornburg
11 South Meridian Street
Indianapolis, IN 46204
(317) 231-7776
For HD Smith

Mr. Kenneth Prabucki (By phone)
Baker Hostetler
127 Public Square, Suite 2000
Cleveland, OH 44114
(216) 861-7718
For Endo Pharmaceutical

APPEARANCES CONTINUED

Mr. Steven Boranian (By phone)

Reed Smith

101 Second Street, Suite 1800

San Francisco, CA 94105

(415) 543-8700

For AmerisourceBergen

THE VIDEOGRAPHER:

Mr. John Stringer

1 (Deposition Exhibit Number 2
2 marked for identification.)

3 Q (Mr. Keyes) I'm going to ask you to pass
4 that binder. We will mark that as Exhibit 2.

5 Prior to the break you were
6 describing forecasts that you prepare either on a
7 quarterly or monthly basis for the county executive
8 and the county council, correct?

9 A Yes.

10 Q Do any of those forecasts specifically
11 discuss the expenses that you anticipate Cuyahoga
12 County will incur in the future because of the
13 opioid problem?

14 A Um, documents that go along with the
15 forecasts discuss categories of expenses that are
16 related to the opiate epidemic, but as I've said
17 before, the county is not in the position to
18 identify, you know, what specific costs can be
19 attributed to prescription opiates, so no.

20 But we do discuss environmental
21 factors and that's one of them that would be
22 included.

23 Q You referenced the opioid epidemic a
24 number of times. When did the opioid epidemic start
25 in Cuyahoga County?

1 MR. BADALA: Objection to form, outside
2 the scope.

3 A The county has identified an impact on its
4 systems and budgets going back to 2006, could be
5 further. The county is not in the position to
6 identify a date of when the epidemic started.

7 Q (Mr. Keyes) So the opioid epidemic
8 started at least by 2006?

9 MR. BADALA: Objection to form,
10 mischaracterizes the testimony.

11 A The county recognized that the opiate
12 epidemic had an impact on the systems and budgets
13 beginning at least in 2006, yes.

14 Q (Mr. Keyes) What was the peak of the
15 opioid epidemic in Cuyahoga County?

16 A The county is not saying that we've
17 reached the peak, we don't know.

18 Q What has the peak been between 2006 and
19 present?

20 MR. BADALA: Objection to form, outside
21 the scope.

22 A I don't have that data. I think the peak,
23 first of all, how is that defined. Is it defined by
24 the number of deaths, is it defined by the number of
25 children we take from their parents who are ill